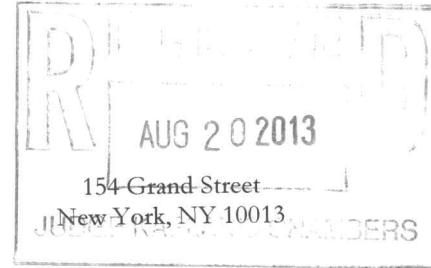


# Zoe Dolan

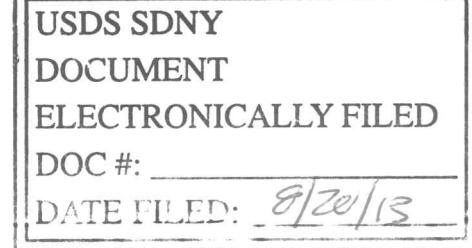
www.zoedolan.com  
zdolan@gmail.com

Attorney At Law  
Admitted NY & CA  
(347) 301-5180



August 19, 2013

The Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
*By Hand*



Re: *United States v. Sulaiman Abu Ghayth*  
98 Cr. 1023

Dear Judge Kaplan:

I am one of the attorneys for defendant Sulaiman Abu Ghayth in the above-referenced case. This letter is submitted to request an adjournment of three business days for submission of the defense pre-trial motion reply papers, which are currently due this Friday, August 23.

The reason for this request is twofold. First, the issues and underlying facts are intricate, and we remain in the process of researching and preparing our response to the government's opposition papers. Second, we are currently in discussions with the government concerning certain matters that bear upon aspects of the motions, including Mr. Abu Ghayth's Due Process and Rule 16 arguments. The requested adjournment will enable us to synthesize the necessary information and refine the issues for presentation to the Court in the defense reply.

I understand that defense counsel Stanley Cohen has spoken with counsel for the government, and there is no objection to a three-day adjournment of the defense reply to August 28. The Court's consideration of this letter is appreciated.

Sincerely,

  
Zoe Dolan

Cc: All counsel via e-mail

*Granted  
q20/13*